

Jorgensen Forge Outfall Site Phase 3 Path Forward - Recommended Talking **Points**

Ryan Barth to: Michael Sibley

09/25/2012 05:53 PM

Cc: John Gross, "Ernst, William D"

, "Garson, Nick", "Tom Colligan", **David Templeton**

Per your request below, the Boeing and Jorgensen teams recommend the following talking points to maintain the final Phase 3 work under the EPA ERU process:

Talking Points

- 1. To date Boeing and Jorgensen Forge have successfully completed cleanout and closure of the majority of the 12" and 24" outfall pipes and collected necessary information to complete the pipes and soil removal along remainder of pipe alignment
- Significantly elevated soil PCB concentrations (greater than 50 ppm) identified in soils under pipe alignment directly adjacent to Lower Duwamish Waterway
- Elevated soil concentrations are directly adjacent to planned sediment and bank cleanup by EMJ/Jorgensen Forge and Boeing
- Elevated soil concentrations need to be removed prior to sediment and bank cleanup to prevent recontamination of the nearby sediment and bank projects, which are scheduled for late summer 2013
- Design, permitting and construction of soil removal can only be conducted within this short time frame under an Office of Emergency Response CERCLA Order, which can be initiated most readily as an amendment to the existing ERU Order and Action Memorandum
- The RPMs for the EMJ/JFC and Boeing Early Actions and the Ecology Cleanup Program PM support administration of this work under the Office of Emergency Response CERCLA Order
- Boeing and Jorgensen are currently proceeding with design evaluations and will be prepared to present remedial options to EPA in the coming weeks

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From: Michael Sibley [mailto:Sibley.Michael@epamail.epa.gov]

Sent: Monday, September 24, 2012 3:14 PM

To: Ryan Barth

Subject: RE: JFOS Total PCB Lateral Extents - Figure

USEPA SF

HI Ryan

In summary from our meeting if you could send me talking points for why it is best for the removal program to perform the work vice RCRA that would be great. Mainly the issues we already discussed at the meeting.

Thanks,

Mike Sibley
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